

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

RECEIVED
SDNY PRO SE OFFICE
2020 OCT -9 AM 11:4

Wilfredo Torres

Write the full name of each plaintiff.

-against-

City of New York, et al.

See attached list.

19 CV 6332

(Include case number if one has been assigned)

SECOND AMENDED
COMPLAINT



Do you want a jury trial?

☒ Yes ☐ No

Write the full name of each defendant. If you need more space, please write "see attached" in the space above and attach an additional sheet of paper with the full list of names. The names listed above must be identical to those contained in Section II.

NOTICE

The public can access electronic court files. For privacy and security reasons, papers filed with the court should therefore *not* contain: an individual's full social security number or full birth date; the full name of a person known to be a minor; or a complete financial account number. A filing may include *only*: the last four digits of a social security number; the year of an individual's birth; a minor's initials; and the last four digits of a financial account number. See Federal Rule of Civil Procedure 5.2.

I. BASIS FOR JURISDICTION

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation, and the amount in controversy is more than \$75,000, is a diversity case. In a diversity case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal-court jurisdiction in your case?

- ☒ **Federal Question**
- ☐ **Diversity of Citizenship**

A. If you checked Federal Question

Which of your federal constitutional or federal statutory rights have been violated?

Illegal search; kidnapping; false arrest; false imprisonment; malicious prosecution; terrorism; use of a federally-funded medical facility for torture purposes.

B. If you checked Diversity of Citizenship

1. Citizenship of the parties

Of what State is each party a citizen?

The plaintiff, _____, is a citizen of the State of _____
(Plaintiff's name)

(State in which the person resides and intends to remain.)

or, if not lawfully admitted for permanent residence in the United States, a citizen or subject of the foreign state of _____

If more than one plaintiff is named in the complaint, attach additional pages providing information for each additional plaintiff.

If the defendant is an individual:

The defendant, _____, is a citizen of the State of
(Defendant's name)

or, if not lawfully admitted for permanent residence in the United States, a citizen or
subject of the foreign state of

If the defendant is a corporation:

The defendant, _____, is incorporated under the laws of
the State of _____

and has its principal place of business in the State of _____

or is incorporated under the laws of (foreign state) _____

and has its principal place of business in _____.

If more than one defendant is named in the complaint, attach additional pages providing
information for each additional defendant.

II. PARTIES

A. Plaintiff Information

Provide the following information for each plaintiff named in the complaint. Attach additional
pages if needed.

Wilfredo Torres

First Name

Middle Initial

Last Name

470 Second Avenue Apt. 2A

Street Address

New York, N.Y. 10016

County, City

State

Zip Code

212-447-1737

Telephone Number

Email Address (if available)

B. Defendant Information

To the best of your ability, provide addresses where each defendant may be served. If the correct information is not provided, it could delay or prevent service of the complaint on the defendant. Make sure that the defendants listed below are the same as those listed in the caption. Attach additional pages if needed.

Defendant 1: **See attached list.**

First Name

Last Name

Current Job Title (or other identifying information)

Current Work Address (or other address where defendant may be served)

County, City

State

Zip Code

Defendant 2:

First Name

Last Name

Current Job Title (or other identifying information)

Current Work Address (or other address where defendant may be served)

County, City

State

Zip Code

Defendant 3:

First Name

Last Name

Current Job Title (or other identifying information)

Current Work Address (or other address where defendant may be served)

County, City

State

Zip Code

INJURIES:

If you were injured as a result of these actions, describe your injuries and what medical treatment, if any, you required and received.

Post Traumatic Stress Disorder (PTSD) requiring treatment and medication; heart disease requiring treatment and medication; exacerbation of asthma requiring treatment and medication; exacerbation of back spine injury requiring treatment and medication.

IV. RELIEF

State briefly what money damages or other relief you want the court to order.

Judgement in the amount of thirty-million dollars (\$30,000,000.00); order defendant HHC Bellevue Hospital to stop allowing its facilities as torture center for the victims of the CIA.

V. PLAINTIFF'S CERTIFICATION AND WARNINGS

By signing below, I certify to the best of my knowledge, information, and belief that: (1) the complaint is not being presented for an improper purpose (such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation); (2) the claims are supported by existing law or by a nonfrivolous argument to change existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Federal Rule of Civil Procedure 11.

I agree to notify the Clerk's Office in writing of any changes to my mailing address. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Each Plaintiff must sign and date the complaint. Attach additional pages if necessary. If seeking to proceed without prepayment of fees, each plaintiff must also submit an IFP application.

October 9, 2020

Dated

Wilfredo Torres

Wilfredo Torres
Plaintiff's Signature

First Name

Middle Initial

Last Name

470 Second Avenue Apt. 2A

Street Address

New York, N.Y. 10016

County, City

State

Zip Code

212-447-1737

Telephone Number

Email Address (if available)

I have read the Pro Se (Nonprisoner) Consent to Receive Documents Electronically:

☐ Yes ☐ No

If you do consent to receive documents electronically, submit the completed form with your complaint. If you do not consent, please do not attach the form.



**United States District Court
Southern District of New York**

Pro Se (Nonprisoner) Consent to Receive Documents Electronically

Parties who are not represented by an attorney and are not currently incarcerated may choose to receive documents in their cases electronically (by e-mail) instead of by regular mail. Receiving documents by regular mail is still an option, but if you would rather receive them only electronically, you must do the following:

1. Sign up for a PACER login and password by contacting PACER¹ at www.pacer.uscourts.gov or 1-800-676-6856;
2. Complete and sign this form.

If you consent to receive documents electronically, you will receive a Notice of Electronic Filing by e-mail each time a document is filed in your case. After receiving the notice, you are permitted one "free look" at the document by clicking on the hyperlinked document number in the e-mail.² Once you click the hyperlink and access the document, you may not be able to access the document for free again. After 15 days, the hyperlink will no longer provide free access. Any time that the hyperlink is accessed after the first "free look" or the 15 days, you will be asked for a PACER login and may be charged to view the document. For this reason, *you should print or save the document during the "free look" to avoid future charges.*

IMPORTANT NOTICE

Under Rule 5 of the Federal Rules of Civil Procedure, Local Civil Rule 5.2, and the Court's Electronic Case Filing Rules & Instructions, documents may be served by electronic means. If you register for electronic service:

1. You will no longer receive documents in the mail;
2. If you do not view and download your documents during your "free look" and within 15 days of when the court sends the e-mail notice, you will be charged for looking at the documents;
3. This service does *not* allow you to electronically file your documents;
4. It will be your duty to regularly review the docket sheet of the case.³

¹ Public Access to Court Electronic Records (PACER) (www.pacer.uscourts.gov) is an electronic public access service that allows users to obtain case and docket information from federal appellate, district, and bankruptcy courts, and the PACER Case Locator over the internet.

² You must review the Court's actual order, decree, or judgment and not rely on the description in the email notice alone. See ECF Rule 4.3

³ The docket sheet is the official record of all filings in a case. You can view the docket sheet, including images of electronically filed documents, using PACER or you can use one of the public access computers available in the Clerk's Office at the Court.

CONSENT TO ELECTRONIC SERVICE

I hereby consent to receive electronic service of notices and documents in my case(s) listed below. I affirm that:

1. I have regular access to my e-mail account and to the internet and will check regularly for Notices of Electronic Filing;
2. I have established a PACER account;
3. I understand that electronic service is service under Rule 5 of the Federal Rules of Civil Procedure and Rule 5.2 of the Local Civil Rules, and that I will no longer receive paper copies of case filings, including motions, decisions, orders, and other documents;
4. I will promptly notify the Court if there is any change in my personal data, such as name, address, or e-mail address, or if I wish to cancel this consent to electronic service;
5. I understand that I must regularly review the docket sheet of my case so that I do not miss a filing; and
6. I understand that this consent applies only to the cases listed below and that if I file additional cases in which I would like to receive electronic service of notices of documents, I must file consent forms for those cases.

Civil case(s) filed in the Southern District of New York:

Note: This consent will apply to all cases that you have filed in this court, so please list all of your pending and terminated cases. For each case, include the case name and docket number (for example, John Doe v. New City, 10-CV-01234).

Name (Last, First, MI)

Address

City

State

Zip Code

Telephone Number

E-mail Address

Date

Signature

Return completed form to:

Pro Se Intake Unit (Room 200)
500 Pearl Street
New York, NY 10007

FACTS:

1---I am erroneously included in the federal government terrorists list, and as such am persecuted, and denied due process of law by the Courts. Exhibit 1.

2--The government of the United States publicly admits that its own Central Intelligence Agency ("the CIA terrorists") blew-up the World Trade Center on September 11, 2001 ("9/11"), slaughtering 3,000 people almost at front of this Courthouse; blamed others; in Iraq alone it slaughtered over 1-million innocent men, women, and children; proudly boasted "mission accomplished"; created a fake "war on terror" at home and abroad; multiplied the military and national security budgets; replaced the U.S. Constitution for the present police-state; activated a totalitarian law called The Patriot Act; a secret and omnipotent Court named Foreign Intelligence Surveillance Court; expanded the government hit-list; and took total control of the news media. Exhibits 2, 3, 4.

3-- The U.S. Attorney for the Southern District of New York, Geoffrey Berman, recently granted the request of the Lawyers' Committee for 9/11 Inquiry, Inc for a grand jury to find out who planted the explosives. Exhibit 5.

4--He was fired a few weeks ago to prevent the investigation. Exhibit 6.

5--Five years ago I filed in this Court case 16CV2362 after the CIA terrorists broke the door of my apartment to carry out a warrantless raid on 9-28-2015.

6--They called the raid a "wellness-check".

-2-

7--They left a note naming Dennis McGowan, Regional Director of the Department of Homeland Security, as the mastermind and the word "intel" implicating the CIA. Exhibit 7.

8--That case was assigned to Magistrate-Judge Kevin Nathaniel Fox, and Judge Ronnie Abrams, who always treated me like a criminal, and fiercely defended the CIA terrorists.

9--Inspired by Judges Fox and Abrams, the CIA terrorists again broke the door of my apartment on 4-28-2016 and carried-out another warrantless raid.

10--I was kidnapped, transported as a John Doe to HHC Bellevue Hospital, illegally detained, assaulted, tortured, involuntarily sedated, and subject to numerous invasive medical procedures including x-rays, drawing blood and urine, and released the next day with a false finding of "delirium". Exhibit 8.

11--They called the raid a "wellness check".

12--Known as The Guantanamo of New York, HHC Bellevue Hospital is the center where the CIA take its victims to be tortured.

13--On 12-13-2018 CIA terrorists NYPD Lieutenant Neil Veras, and NYPD Police Officer Patricia De Jesus, attempted to gain access to my apartment by breaking the door with a sledgehammer.

14--On 12-21-2018 Veras and De Jesus falsely arrested me on a misdemeanor charge; a Judge released me the same day and soon thereafter dismissed it.

-3-

15--On 2-20-2019 Veras, DeJesus, and others, tried to break the door of my apartment to gain access; they made threats such as "WE WILL TELL ALL YOUR NEIGHBORS THAT YOU ARE A RAPIST AND A PEDOPHILE".

16--On 2-27-2019 Veras, De Jesus, NYPD Police Officer Dioasky Pena, NYPD Police Officer Daniel Pearles, and NYPD Police Officer Mateusz Hader carried-out a warrantless raid of my apartment; and falsely arrested me on a misdemeanor charge.

17--Veras ordered Pena, Pearles, and Hader to remove me from the apartment and transport me to the 13th. precinct while he and De Jesus stayed behind.

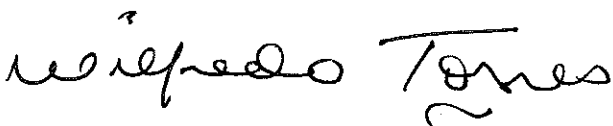
18--Facing neighbors and friends, I was taken in handcuffs out of the building; paraded at front of a pizza restaurant which is at issue in this case; taken to the 13th police precinct; with ankle shackles and handcuffed behind my back taken to HHC Bellevue Hospital psychiatric ward; to the police station; to Court; to the police station; to HHC Bellevue Hospital; to the police station; and to Court where still handcuffed behind my back a Judge released me after 32 hours of torture. The case was dismissed soon later, even without a defense lawyer present.

19--TERRORISTS NEIL VERAS, AND PATRIZIA DE JESUS HAD STAYED BEHIND SEARCHING AND RANSACKING MY APARTMENT. EXHIBIT 9.

20--WHILE IN THE APARTMENT, VERAS MADE COMMENTS SUCH AS:

"TORRES FILES LAWSUITS AGAINST EVERYONE".

"I WLL GIVE HIM A COTSCO CERTIFICATE TO TROW AWAY ALL THE JUNK IN THIS APARTMENT".

A handwritten signature in black ink, appearing to read "Wilfredo Torres". The signature is written in a cursive, flowing style with a large, stylized 'T' at the end.

DEFENDANTS OF CASE SDNY 19CV6332:

City of New York
Attn. Law Department
100 Church Street
New York, N.Y. 10007

New York City Police Department
Police Lieutenant Neil Veras (Shield Unknown)
14th. Precinct
357 West 35th. Street
New York, N.Y. 10001

New York City Police Department
Police Officer Patricia De Jesus (Shield 1305)
13th. Precinct
230 East 21st. Street
New York, N.Y. 10010-7460

New York City Police Department
Police Officer Dioasky Pena (Shield 10240)
13th. Precinct
230 East 21st. Street
New York, N.Y. 10010-7460

New York City Police Department
Police Officer Daniel Pearles (Shield 15167)
13th. Precinct
230 East 21st. Street
New York, N.Y. 10010-7460

New York City Police Department
Police Officer Mateusz Hader (Shield 9149)
13th. Precinct
230 East 21st. Street
New York, N.Y. 10010-7460

Arkaprava Deb, M.D.
HHC Bellevue Hospital
462 First Avenue
New York, N.Y. 10016

Steven Lasley, M.D.
HHC Bellevue Hospital
462 First Avenue
New York, N.Y. 10016

New York City Health & Hospitals
125 Worth Street
New York, N.Y. 10013

DANIEL L. MEYERS
ATTORNEY-AT-LAW
350 BROADWAY, SUITE 308
NEW YORK, NY 10013
(212) 226-4106 (PHONE)
(212) 431-0107 (FAX)

May 23, 2006

Central Intelligence Agency
Information and Privacy Coordinator
Washington, D.C. 20505

**Re: Freedom of Information Act Request
On behalf of Mr. Wilfredo Torres**

Dear Information and Privacy Coordinator:

Your undersigned is the attorney for Mr. Wilfredo Torres, who has, in writing, authorized me to request on his behalf certain records and information from your agency as more fully described below. (Attached is the duly notarized authorization).

This letter constitutes a request pursuant to the Freedom of Information Act, 5 U.S.C. § 552 ("FOIA"), and the Privacy Act, 5 U.S.C. § 552a ("PA"). Similar requests have been submitted to the Transportation Security Organization ("TSA"), the Department of Justice ("DOJ"), the Department of Homeland Security ("DHS"), the Federal Bureau of Investigation ("FBI") and the National Security Agency ("NSA").

The following personal information is submitted to specifically identify the party in interest:

- Mr. Wilfredo Torres;
- 470 Second Avenue, Apt. 2A
New York, NY 10016;
- Date of birth, March 23, 1952;
- Place of birth, San Juan, Puerto Rico;
- Social Security number, 584-42-7541.

For many years, including 2006, Mr. Torres travels frequently between New York and Puerto Rico. His principle travel purpose is to visit with family. He has been designated wrongfully, by your agency and/or in concert with other governmental agencies and/or the airlines, as a person who poses or is suspected of posing "a threat to civil aviation." As a

6/21/2019

PressTV-'I think I know' who was behind 9/11: Trump

PressTV-'I think I know' who was behind 9/11: Trump

Just this side of the Times / 2019



'It was not Iraq. It were other people', says Trump

Home / US / Politics

Mon Jun 17, 2019 03:25PM [Updated: Mon Jun 17, 2019 05:57PM]



US President Donald Trump talked to ABC News' George Stephanopoulos on Sunday.

US President Donald Trump says he knows who was behind the September 11, 2001 terrorist attacks that left thousands of Americans dead.

In an exclusive interview with ABC News' George Stephanopoulos broadcast on Sunday, Trump categorically said that "Iraq did not knock down the World Trade Center."

3/19/2019

Terror Watch List Counter: A Million Plus

Published on American Civil Liberties Union (<https://www.aclu.org>)

3

Terror Watch List Counter: A Million Plus ^[1]

Why are there so many names on the U.S. government's terrorist list?

In September 2007, the Inspector General of the Justice Department reported ^[2] that the Terrorist Screening Center (the FBI-administered organization that consolidates terrorist watch list information in the United States) had over 700,000 names in its database as of April 2007 - and that the list was growing by an average of over 20,000 records per month.¹ (See also this new March 2008 report ^[3].²)

By those numbers, the list now has over one million names on it. Terrorist watch lists must be tightly focused on true terrorists who pose a genuine threat. Bloated lists are bad because

- they ensnare many innocent travelers as suspected terrorists, and
- because they waste screeners' time and divert their energies ^[4] from looking for true terrorists.

Watch list main page ^[5]

Airline security page ^[6]

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Source URL: <https://www.aclu.org/other/terror-watch-list-counter-million-plus#comment-0>

Links

[1] <https://www.aclu.org/other/terror-watch-list-counter-million-plus>

[2] <http://www.usdoj.gov/oig/reports/FBI/ao741/final.pdf>

[3] <http://www.usdoj.gov/oig/reports/plus/ao816/final.pdf>

[4] <https://www.aclu.org/privacy/gen/26535res20060824.html>

[5] <https://www.aclu.org/technology-and-liberty/watch-lists>

[6] <https://www.aclu.org/technology-and-liberty/airline-security>

2/18/2014

PressTV - "US Terrorism List Violates US Civil Liberties"



Home News Programs Documentaries US

Tuesday Feb 18, 2014 12:01 PM GMT www.liveleak.com/c/PressTV

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4

"US Terrorism List Violates US Civil Liberties"

The Federal Bureau of Investigation, the national policing agency of the United States, admits to having compiled a "Terrorist Screening Database" with the names of persons suspected or alleged to be involved in terrorism.

The list contains the names of over a million people, who have been convicted of no crime and given no chance to defend themselves. One activity of the "Terrorism Screening Database" is the creation of the "No Fly List", which prevents thousands of people, including many US citizens, from boarding any aircraft. Once added to the list, things in their lives can become very difficult. Wilfredo Torres, suddenly found himself being subject to all kinds of harassment after he began protesting discrimination in travel policies. In one instance he was removed from a flight by airline officials. When Mr. Torres lawyer filed a request for information, the FBI revealed that it had collected over 100 pages of information about him. He now wants to have his name removed from the list. The FBI and other divisions of the US Department of Justice, have a long history of suppressing political dissidents over the last several decades. A law suit has been filed by the American Civil Liberties Union, in the hopes that courts will intervene, and halt the continued use of such lists.

Select Bitrate ▼

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Caleb Maupin, Press TV, New York

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Fact Corner

Wilfredo Torres, a political dissident, was added to the "No Fly List" after he was arrested in 2001. He was later released and has since been living in the United States. He has been subject to harassment and discrimination in travel policies.

Latest From Video Reportages

- Brazil to criminalize protests during Soccer World Cup
- "US Terrorism List Violates US Civil Liberties" 3 hrs ago
- Iran P5+1 resume nuclear talks 4 hrs ago
- Pressure rises on Greece to comply with €10.7bn bailout terms
- Italy's president asks Matteo Renzi to form new government 5 hrs ago
- Violence increases in Iraq 5 hrs ago

» See more Videos

Poll

Is the war against Syria's government a freedom-seeking battle, or a terrorist one?

- ☐ 1) It is a battle waged by freedom-seeking forces
- ☐ 2) It is a battle waged by foreign-backed terrorists.



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UN to evacuate MKO terrorists from Iraq

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5

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Now the Lawyers' Committee and AE911Truth are working to ensure a *thorough and successful* grand jury investigation.

6/29/2020

Update: U.S. Attorney Berman Agrees To Step Down - Gothamist

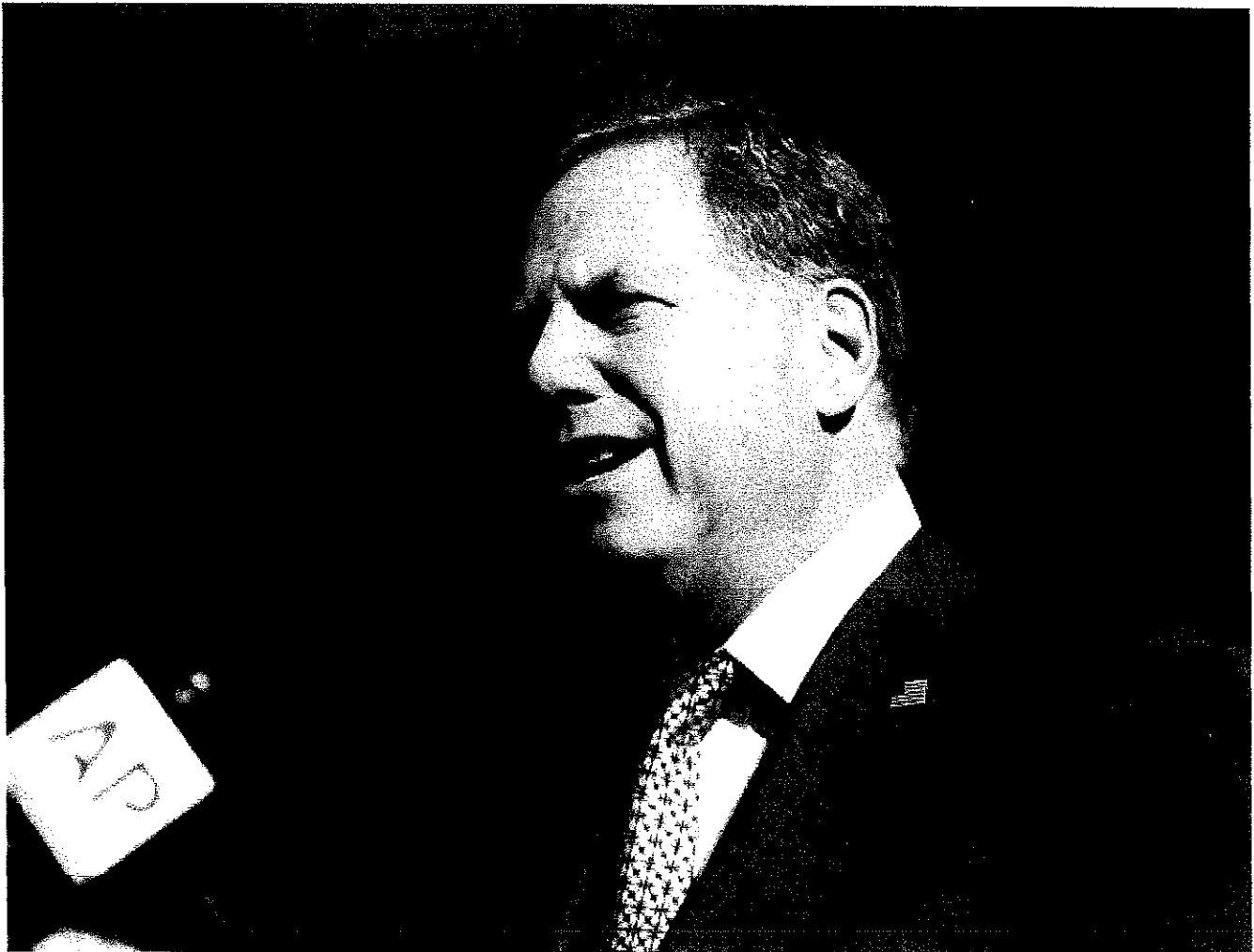
6

NEWS [/NEWS]

Update: U.S. Attorney Berman Agrees To Step Down

BY [DAVID CRUZ](#) [/STAFF/DAVID-CRUZ]

JUNE 20, 2020 9:54 A.M. • [60 COMMENTS](#)



Geoffrey Berman. FRANK FRANKLIN II/AP/SHUTTERSTOCK

7

Tntel

Mcgowan, Dennis

Unknown-M,Dogwood, 54 y/o M, DOB 1/1/62

MRN 3727225, visit 3727225-1

Bellevue Hospital Center, medicine

Discharge Instruction Sheet

4/29/16 13:55

8

Last edit by White,LeRoy, RN on 4/29/16 14:00, complete.
(Patient Instructions)

IMPORTANT: Please bring this form to your first appointment with your doctor.

Physician Discharge Instructions by An,Nicholas, MD (Attending Hwang,John, MD) as of 4/29/16 01:29pm

Discharge Date: 4/29/16

Diagnoses:

The principle reason(s) for your hospitalization were: Delirium

Activity and Diet:

Home Care Ordered: no home care required

Activity: as tolerated

Home Diet: Regular

Your Medications Are:

Home Medication List

Discharge Medications

Smoking Status and Additional Information:

You are not a smoker.

Discharge Equipment Required: none,

No follow-up appointments necessary

